

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 4:18-CR-00128
	:	
	:	
v.	:	(JUDGE BRANN)
	:	
	:	
JOHN SHERMAN JUMPER	:	

**CONSENT PROTECTIVE ORDER**

**WHEREAS**, on May, 2018 the United States Attorney advised defense counsel for the defendant, John Sherman Jumper, of the continuing availability of a large volume of documents and records consisting of financial and business records containing personal identification information and other confidential information for individuals and business entities other than the defendant, numbered for purposes of discovery as pages are PROD01 - 000001; PROD01B - 43503; PROD02-00043505 - PROD02-00043641; PROD01B - 00043504 (hereinafter "discovery documents").

**WHEREAS**, the records contain social security number(s), date(s) of birth, official state, federal, or government issued driver's license or identification numbers, tax identification numbers, account numbers, account codes, and/or other means of identification and account access (hereinafter "identification and account information").

**WHEREAS**, the defendant and the United States further acknowledge that disclosure of the contents of the financial records, including identification and account information contained therein, and confidential financial records, to third parties not in connection with the prosecution and defense of the instant criminal charges may have detrimental legal and economic consequences the individuals and entities to which the identification and account information is related.

**WHEREAS**, because of the large volume of information to be produced, redaction of any references to identification and account information and other confidential and sensitive information will not be feasible prior to production of the discovery documents.

**ACCORDINGLY**, by consent of the defendant John Sherman Jumper and the United States, as acknowledged below, and pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, it is, this 15<sup>th</sup> day of August 2018, **HEREBY ORDERED** that:

(1) the defendant, defense counsel, and defense counsel's staff shall keep secure and confidential any identification and account information contained in the discovery documents;

(2) the defendant, defense counsel, and defense counsel's staff shall not copy, reproduce, or extract any identification and account information or medical records contained in any of the discovery documents;

(3) the defendant, defense counsel, and defense counsel's staff shall not disclose any identification and account information contained in the discovery

documents to any person, in any form, whether printed or electronic;

(4) if defense counsel believes it is necessary for the preparation of a defense in this case to disclose any of the contents of the electronically stored material to any person other than the defendant, with the exception of defense counsel's staff, his investigators, his administrative staff, and such other disclosures as necessary in furtherance of any proceedings connected with this case, defense counsel shall, prior to disclosure to any third parties, make application to the Court, under seal, requesting an order authorizing disclosure of the discovery documents and proposing a redacted version of the materials which delete and/or obliterate any and all references to identification and account information; in the application seeking authorization to disclose the materials, defense counsel shall certify to the court that the materials do not contain references to identification and account information and/or that such reference have been deleted or obliterated;

(5) any person to whom disclosure of these materials is authorized shall be subject to the terms of this consent protective order, shall be directed by defense counsel not reproduce or disclose the contents of the discovery documents to any other person, shall be served by defense counsel with a copy of this order and any subsequent order authorizing disclosure for the limited purpose of preparing a defense in this case, and shall acknowledge in writing that said person has been advised not to reproduce or disclose the contents of the records and documents;

(6) the defendant, defendant's counsel, and any person to whom disclosure is authorized shall not make any use of the contents of the discovery documents except

in connection with preparing and presenting a defense in this case;

(7) not later than 10 days after any sentence is imposed or this matter is otherwise concluded in the district court, the defendant and any parties to whom records have been provided shall return the records and documents and any copies of those materials, in any form, to defense counsel, who shall securely maintain the records and documents subject to the conditions and requirements set forth in this consent protective order.

*s/ Matthew W. Brann*

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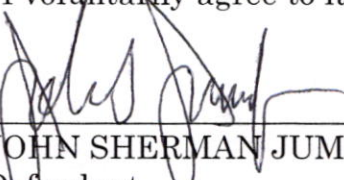
Matthew W. Brann  
United States District Judge



ACKNOWLEDGMENTS

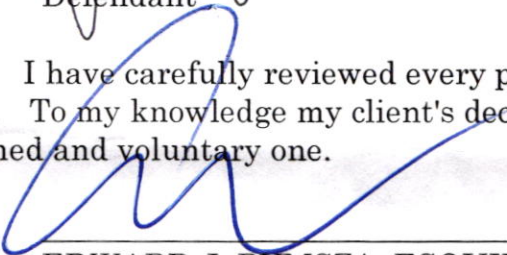
I have read this consent protective order and carefully reviewed every part of it with my attorney. I fully understand it and I voluntarily agree to it.

August 1<sup>st</sup>, 2018  
Date

  
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JOHN SHERMAN JUMPER  
Defendant


I am the defendant's counsel. I have carefully reviewed every part of consent protective order with the defendant. To my knowledge my client's decision to agree to this consent protective order is an informed and voluntary one.

8/3/18  
Date

  
\_\_\_\_\_  
EDWARD J. RYMSZA, ESQUIRE  
Counsel for Defendant

DAVID J. FREED  
UNITED STATES ATTORNEY  
by

8-8-2018  
Date

  
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GEORGE J. ROCKTASHEL  
Assistant United States Attorney